

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

NATIONAL FEDERATION
OF THE BLIND, INC., *et al.*,

Plaintiffs,

v.

Civil Action No. 19-2228-SAG

LINDA H. LAMONE, *et al.*,

Defendants.

* * * * *

JOINT STATUS REPORT

The parties submit this status report pursuant to the Court’s December 26, 2019 Order, ECF No. 47, granting Plaintiffs’ motion for leave to file their reply in support of their preliminary injunction motion under seal and requiring the parties to submit a status report by January 7, 2020 detailing efforts to file a publicly available version of the reply memorandum with confidential portions redacted. Because of the expedited nature of discovery in this matter, the parties, along with counsel for Election Systems & Software (“ES&S”), agreed that documents produced to Plaintiffs would largely be marked confidential, as would the entire deposition transcript for ES&S’s Rule 30(b)(6) deposition, with the parties and ES&S later conferring about the precise information that needed to remain confidential in public filings.

Pursuant to that agreement, counsel for Plaintiffs emailed Defendants’ counsel on December 26, 2019 to request that they notify them of any portions of the reply memorandum that needed to be redacted before it could be shared with ES&S’s counsel for their own review of necessary redactions. Defendants’ counsel responded the next day and Plaintiffs’ counsel shared a redacted version of the reply memorandum and exhibits with counsel for ES&S that same day,

asking them to respond with requested redactions by January 6, 2020. On January 6, Plaintiffs' counsel again emailed counsel for ES&S and left a voicemail inquiring about the status of redactions. Lead counsel for ES&S left Plaintiffs' counsel a voicemail on the evening of January 6, informing them that he was in trial all week and would not be able to review the documents for necessary redactions before the end of this week.

In the interim, unless the Court would prefer that Plaintiffs file a public version of their reply memorandum and exhibits containing large swaths of redactions some time this week, Plaintiffs will attempt to confer with counsel for ES&S next week to determine appropriate, more tailored redactions and file the public version of their reply shortly thereafter.

Dated: January 7, 2019

Respectfully submitted,

/s/ Jessica P. Weber

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